

DECLARATION OF EDWARD B. KANG

I, Edward B. Kang, declare as follows:

1. I am an attorney at law duly authorized to practice before this Court and all Courts of this state and I am a Principal Assistant City Attorney for the City of Glendale, City Attorney's Office, counsel for Defendants, CITY OF GLENDALE, GLENDALE POLICE DEPARTMENT, OFFICERS ABRAHAM CHUNG and TRAVIS GOODREAU in the above-entitled action. I have personal knowledge of the facts stated herein and if called to testify as to any of those matters, I could and would competently do so.

2. Submitted herewith as Exhibit 2 is a true and correct copy of the Glendale Police Department's Policy 100 – Law Enforcement Authority.

3. Submitted herewith as Exhibit 3 is a true and correct copy of the Glendale Police Department's Policy 314 – Search and Seizure.

4. Pursuant to L.R. 7-3, I met and conferred with Plaintiff's counsel, Michael Devereaux on February 16, 2023, regarding the contents of the instant motion. Additionally, I had a follow up discussion with him regarding the motion on February 28, 2023. Despite meeting and conferring, we were unable to come to an agreement as to any of the contents of the instant motion.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed this 16th day of March, 2023, at Glendale, California.



Edward B. Kang, Declarant